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Attorneys for Mr. Lawrence Doss (2)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE JEFFREY T. MILLER)

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAWRENCE DOSS (2),

Defendant.

Case No.: 08cr0650-02-JM

Date: May 23, 2008

Time: 11:00 p.m.

NOTICE OF MOTIONS AND MOTIONS TO:

- (1) **SEVER DEFENDANTS;**
- (2) **SUPPRESS STATEMENTS;**
- (3) **SUPPRESS ALL EVIDENCE SEIZED
IN VIOLATION OF THE FOURTH
AMENDMENT;**
- (4) **DISMISS INDICTMENT DUE TO
MISINSTRUCTION OF GRAND JURY;
AND**
- (5) **GRANT LEAVE TO FILE FURTHER
MOTIONS**

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
STEVEN DE SALVO, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on Friday, May 23, 2008, at 11:00 a.m., or as soon thereafter as counsel may be heard, the accused, Lawrence Doss, by and through his attorneys, John C. Ellis, Jr. and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions outlined below.

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MOTIONS

Defendant, Mr. Doss, by and through his attorneys, John C. Ellis, Jr. and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all Other Applicable Statutes, Case Law and Local Rules, Hereby Moves this Court for an Order To:

- 1) Sever Defendants;
- 2) Suppress Statements;
- 3) Suppress All Evidence Seized In Violation of the Fourth Amendment;
- 4) Dismiss Indictment Due to Misinstruction of Grand Jury; and
- 5) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at or before the time of the hearing on these motions.

Respectfully submitted,

Dated: May 12, 2008

s/ John C. Ellis, Jr.
JOHN C. ELLIS, JR.
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Doss
john_ellis@fd.org